

ETICAM Corporation
Compliance Evaluation Inspection

SFUND RECORDS CTR
2390697

POTENTIAL VIOLATIONS:

1 40 CFR Part 262.34(a)(2) and
262.34(a)(3):

ETICAM did not label a roll-off container of salt waste located outside near the Salt Pad with the words, "Hazardous Waste," or with the accumulation date (Photo No. 24).

2 40 CFR Parts 262.34(a)(1) and
265.173(a):

A container of waste "Sample and Sink Wash Out" labeled "Acid Waste Only" located in the laboratory was left open while in storage. (Photo No. 2) Also, a roll-off container of waste salt (F006) was left open while in storage (Photo No. 24).

3 40 CFR Part 264.15(a):

ETICAM does not inspect the Truck Receiving Bay for the condition of the containers of sludge waste which may lead to a release of hazardous waste (Photo No. 11).

4 40 CFR Part 264.35:

ETICAM does not maintain aisle space between containers of sludge metallic wastes in the Truck Receiving Bay (Photo No. 11).

5 40 CFR Part 264.173(b) and Permit
Part III.E.:

Containers in the Truck Receiving Bay were leaning precariously indicating that they were not being stored in a manner to prevent them from rupturing (Photo No. 11).

6 40 CFR Part 265.15(b)(1) and
265.15(d):

ETICAM does not record in the inspection log the facts that: 1) There was a hole in the circular hazardous waste tank at the Crystallization Pad; and 2) The waste salt by-product roll-off container was not labeled with the words, "Hazardous Waste," and/or the accumulation date (Photo Nos. 23 and 24).

7 40 CFR Part 265.195(a)(2) and
265.195(a)(4):

ETICAM did not inspect the above-ground portions of the construction material of the circular tank located in the salt crystallization area to

detect the release of hazardous waste (Attachment 5C and Photo No. 23).

ETICAM did not remove from service a circular hazardous waste tank in the salt crystallization area that had a hole on the bottom and was observed leaking (Photo No. 23). In addition, ETICAM did not remove the waste from the tank to prevent further releases.

8 40 CFR Parts 265.196(b):

ETICAM, as generator of the waste salt by-product, does not test this waste or an extract, using the TCLP.

9 40 CFR Part 268.7(a):

ETICAM, as treatment facility, does not test the treatment residues of waste with treatment standards expressed as concentrations in the waste extract (Part 268.41) using the TCLP. These wastes include F006, K061, and K062.

10 40 CFR Part 268.7(b)(1):

ETICAM does not measure each bulk bag or box and mark each with the equivalent yardage. (Attachment 5A)

11 Consent For The Issuance Of A Decree,
Case No. 91-00112A: